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October 28, 2021

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

   Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

  I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") concerning a sealed filing made by Saudi Arabia today to supplement the record before the oral argument scheduled for today at 4:30 p.m. As set forth in the letter, the materials with which Saudi Arabia seeks to supplement the record were produced late last night.

  Saudi Arabia's letter discusses and attaches materials that John Fawcett ("Fawcett") has designated as confidential under the MDL protective order, ECF No. 1900. Although Saudi Arabia does not believe that the letter should remain under seal, there is not enough time to meet and confer with counsel for Fawcett before this afternoon's argument. Accordingly, Saudi Arabia respectfully requests that the Court accept the letter under temporary seal subject to appropriate meet-and-confer discussions between counsel.

  Saudi Arabia is making today's filing under seal using the Court's sealed ECF procedures. Copies of Saudi Arabia's letter and exhibits are being sent today by email to Your Honor's chambers and to counsel for Fawcett, Kreindler & Kreindler LLP, the non-Kreindler members of the Plaintiffs' Executive Committees, the United States, and Dallah Avco. No courtesy copies of today's sealed filing are being sent to the chambers of Judge Daniels, as instructed by the temporary revisions to his Individual Practices in light of the ongoing public health crisis.

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

The Honorable Sarah Netburn
October 28, 2021
Page 2

Respectfully submitted,

/s/ *Michael K. Kellogg*

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)